

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BOLD ST. PETERS, L.P.,

Plaintiff,

V.

C.A. NO. _____

**BOLD ON BOULEVARD LLC, RCG
BOLD GP LLC, BOLD
APARTMENTS, LLC, RCG BOLD 1
LLC, RCG BOLD 2 LLC, RCG BOLD
3 LLC, RCG BOLD 4 LLC, AND RCG
BOLD 5 LLC, AND NACHMAN Y.
TEREN,**

Defendants.

DECLARATION OF MARK STEIN

I, Mark Stein, make the following declaration pursuant to 28 U.S.C § 1746:

1. I am the Chief Financial Officer of Defendants RCG Bold GP LLC, Bold Apartments, LLC, RCG Bold 1 LLC, RCG Bold 2 LLC, RCG Bold 3 LLC, RCG Bold 4 LLC, and RCG Bold 5 LLC (“Removing Defendants”). I have personal knowledge of, or was supplied with documents or information from persons with knowledge supporting, the facts stated herein.

2. In my role as CFO of the Removing Defendants, I am familiar with the members of these entities as well as the citizenship or domicile of the individuals that make up the membership of the entities.

3. The member of RCG Bold 1 LLC is RCG Houston 2 SM LLC.

a. The members of RCG Houston 2 SM LLC are Hillwood Capital LLC, MES RE Estates LLC, Eagle Capital Investments LLC, and

Coventry Park Resources LLC, as well as individuals who are citizens of New York, New Jersey, and Florida.

- i. The member of Hillwood Capital LLC is an individual who is a citizen of New York.
 - ii. The member of MES RE Estates LLC is an individual who is a citizen of New Jersey.
 - iii. The member of Eagle Capital Investments LLC is an individual who is a citizen of New Jersey.
 - iv. The member of Coventry Park Resources LLC is an individual who is a citizen of New York.
4. The member of RCG Bold 2 LLC is MJS 11-10 Trust (the Trustee is a citizen of New York).
5. The member of RCG Bold 3 LLC is MS New Prov Realty LLC.
 - a. The member of MS New Prov Realty, LLC is an individual who is a citizen of New Jersey.
6. The member of RCG Bold 4 LLC is SDJ Group Associates, LLC.
 - a. The member of SDJ Group Associates, LLC is an individual who is a citizen of New York.
7. The member of RCG Bold 5 LLC is GSD Group Associates, LLC.
 - a. The member of GSD Group Associates, LLC is an individual who is a citizen of New York.
8. The member of Bold Apartments, LLC is RCG Bold SM, LLC.

a. The members of RCG Bold SM, LLC are individuals who are citizens of New York, New Jersey, and Missouri.

9. The members of RCG Bold GP, LLC are individuals who are citizens of New Jersey.

Under penalties of perjury, I declare that I have read the foregoing Declaration and that the facts stated in it are true to the best of my knowledge.

EXECUTED on July 15, 2024, by

Mark Stein

MARK STEIN